

CAMPAIGN TO PROTECT RURAL ENGLAND (CPRE)

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22.7.15

Mrs Sharon Crawford,
South Oxfordshire District Council

Dear Mrs Crawford,

Application P15/S2202. Beckley/Elsfield Solar Farm

CPRE objects to this application on the grounds of harmfulness to the Green Belt, Oxford Heights character area, and settings of Oxford and Elsfield, and of the unjustifiable and unnecessary loss of agricultural land.

We do not consider that the trivial amount of renewable energy the site might yield goes any distance to outweighing the cumulative harm.

1. Unacceptable harm to openness of Green Belt.

It is Government Planning Guidance that elements of renewable energy are inappropriate development in the Green Belt. Few could be more so than the serried ranks of industrial panels which comprise a solar farm, with inverter buildings and high security fencing.

As the Inspector refusing an application elsewhere described it:

The regimented rows of hard surfaced solar panels would represent intrusive, utilitarian elements on an industrial scale in the open countryside. Together with its associated new buildings and structures, the proposal would have a considerable urbanising impact in this rural location (Inspector's Decision Letter, APP/D3505/A/13/2204846).

Paragraph 87 of the National Planning Policy Framework (NPPF) states that "...inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances", and paragraph 88 states that "Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

The main issues, therefore, are; first, whether the proposed solar farm would cause any other harms in addition to inappropriateness; second, whether the harms caused are clearly outweighed by other considerations. They are not.

The development would clearly be severely damaging to the openness of the Green Belt, especially on an otherwise open site such as this, adjacent to the village land to unspoilt Elsfield, and on an elevated location on the Oxford Heights overlooking the City.

Other adverse considerations to be taken into account are the impact on the landscape and the setting of Oxford, and the loss of agricultural land.

These are in no way offset by the site's meagre and trivial contribution to carbon reduction.

2. Inappropriate to the Oxford Heights Character Area, the setting of Oxford, and of the Elsfield Conservation Area.

- a. The Oxford Heights Landscape Assessment Character Area covers the ring of hills surrounding, and forming an essential part of the setting of, the City of Oxford.

The assessment notes that the Oxford Heights have an "attractive and unspoilt rural character", with a high visual sensitivity. It comments particularly on the attractive wooded hills and valleys..to the west of Beckley. The application site is on the boundary of the "wooded hills and valleys" and "open farmed hills" to the west of Beckley, and the width of the lane from the area for conservation.

It typifies the unspoilt rural character the Landscape Assessment describes. The applicant is wrong to suggest that the installation of a solar farm with inverter buildings and security fences on an elevated site in this area would be relatively inconsequential.

On the contrary, the area's acknowledged rural character and openness, and its sensitive nature, would be very substantially blighted by the imposition of an industrial development of this nature and scale.

- b. The site is on an elevated location in the Oxford Heights to the North East of the City. The John Radcliffe Hospital and parts of the City can be clearly seen across the site from head height at the roadside field gate (This is the applicant's viewpoint 4 although neither the hospital nor the City are visible in their photograph).

The panels could therefore be seen from these points. Further, the panels would face South to catch maximum insolation, and with their height and the lack of intervening high points and could cause reflections (the glint and glare referred to in the PPG) drawing the eye from the City to their inappropriate presence.

- c. The transition from the busier A4027 in to the very rural lane to Elsfield and its conservation area is an essential part of the entrance to the village.

The installation of an industrial development beside this lane would be damaging to that transition, and a jarring element in an otherwise rural setting.

3. Use of Agricultural Land for this development is not in the National Interest, is not shown to be necessary, and use of high grade land is particularly unacceptable.

The importance of using land to improve food self-sufficiency outweighs its use for solar energy. It is relevant that twenty years ago the UK produced 87% of its own food, a figure now down to 68%. The UK's staple crop, wheat, has not seen yields increase in the past 15 years, whilst population has grown substantially.

In a statement last October, Liz Truss, then and now Environment Secretary, said "*I am committed to food production in this country and it makes my heart sink to see row upon row of solar panels where once there was a field of wheat or grassland for livestock to graze.*"

Because of the vital importance of agricultural land, Paragraph 112 of the NPPF states that *Where significant development of agricultural land is **demonstrated** to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.*

This is clarified in the PPG as *where a proposal involves greenfield land, whether the proposed use of **any** (my emphasis) agricultural land has been shown to be necessary **and** poorer quality land has been used in preference to higher quality land.*

It is clearly important to minimise use of agricultural land for development, not least as our food self-sufficiency is already poor and declining, and a greater strategic issue than the development of intermittent solar power.

The Oxfordshire County Council Position Statement on Major Development Proposals for Ground-mounted Solar PV Arrays Solar Policy Statement, adopted in November 2014, echoes National Advice at para 27:

where large scale solar PV farms are proposed on greenfield land, the developer should show that the use of agricultural land is necessary.

*Poorer quality land should be used in preference to higher quality land, and the Best and Most Versatile (BMV) agricultural land (grades 1, 2 and 3a) should be **avoided**.*

It is clear that there are two tests here:

1. Can use of agricultural land of whatever grade be shown to be necessary?
2. IF SO, can use of higher grade land be justified?

Appendix A of the applicants Design and Access statement purports to address these issues.

a. Necessity to use agricultural land at all.

Government Advice from the previous Energy Minister was that many multiples of the solar energy it was even desirable to provide could be derived from installations on existing roofs, and that it was there – and not on large solar farms in open countryside – that development of solar should be “focussed”. His letter is attached. He also notes that there are no national targets to be met. Neither are there any local ones.

It follows that use of agricultural land for solar cannot be “necessary” until all opportunities on roofs have been exhausted, and then only if there were local or national targets remaining unmet.

Clearly the Minister would not have had in mind that single developments the size of 12 hectare open field solar farms were necessary, or could be accommodated on individual roofs – even Euston Station in London is only 5 hectares – but that the sum of individual roofs would provide the capacity.

It is not necessary – and is indeed undesirable – that solar energy should be derived from large scale open field solar farms, but instead should – and could - be derived from existing roofs. There is no shortage of roofs locally.

Appendix A of the applicants Design and Access Statement does not address necessity to site solar energy on large parcels of open agricultural land, rather than on roofs or brownfield, at all. Instead it deals with the economic attractiveness of large open greenfield sites to solar farm developers, and the purported lack of available brownfield sites of similar size, both of which are irrelevant issues.

As Nick Boles when Planning Minister remarked in the House, the test of necessity to use agricultural land is a high one. The applicant fails to meet it.

b. Unacceptable Use of Higher Grade Land

The application site is preponderantly 3a with an element of Grade 2, and is therefore entirely best and most versatile land.

Even if the test of necessity to use agricultural land had been met in principle, National Policy still requires lower quality land to be selected. The Oxfordshire County Policy goes a step further in stating that use of higher quality land “should be avoided”.

Higher quality land is the most productive land, and more vital to food security. It is even less acceptable to lose land of this quality to solar farms.

4. Meagre contribution to carbon saving and energy security

As the Minister of State has pointed out only this morning, solar power is available effectively only in the high summer months, and insignificantly in winter when demand for energy is highest. Electricity cannot be stored on a commercial scale and therefore solar plays an insignificant role in energy provision or security.

The applicant estimates that the electricity produced by this site would be equivalent to that used by 1449 average homes. By this they mean the usage recorded on domestic meters. Domestic meters cover just under a third of the community's electricity usage, the rest being transport, workplaces, street lighting etc. It would make no contribution to the needs for energy from oil and gas.

At the last census there were 54,000 households in South Oxfordshire. The site would contribute insignificantly even to this District's electricity needs, and even less to our overall energy needs. Even then, it would be effective only during the summer months.

This is a very meagre contribution to carbon reduction in relation to the harm that would be created.

5. Claimed benefits of continuing agriculture and ecological enhancement.

- a. It is true that some minimal agricultural use, typically grazing, might be able to occur between the panels of a solar farm, and may have some benefit in keeping down weeds that might otherwise obscure the panels. The agricultural benefit will however be insignificant in relation to the potential of the land if left open.

Not only will effective land use management be prevented by the structures, but the very purpose of solar panels is to capture sunlight which is the main agent of plant growth and indirectly or stock rearing.

The continuing agricultural use will be presentational rather than real.

- b. No ecological benefits are proposed which could not be provided without a solar farm being constructed.

6. Temporary Permission.

Much is made in solar farm applications of their being only for a "temporary" use of the land. In this case a "temporary" period of 30-35 years, or until use of the panels has ceased, is proposed.

However, even taking 35 years – longer than many permanent permissions endure – to be “temporary”, if at the end of this period permission for a renewal of this, or even for a similarly intrusive development, was sought, it is hard to see on what grounds it could be refused.

This issue was addressed directly by the Inspector in his refusal decision 2222025, where a shorter period of 25 years was suggested, when he said:

*25 years, however, is about a third of a person’s lifetime and is the span of a generation. Furthermore, there is no guarantee that planning permission would not be granted, after 25 years, for the replacement of the solar panels for a further 25 year period. **Very little weight is therefore given to the reversibility of the scheme.***

Conclusion

For a period of at least 35 years, and perhaps indefinitely, the development would harm the openness of the Green Belt, the Oxford Heights character area, and the settings of Oxford and Elsfield. It would effectively remove agricultural land of a high quality from production of crops, and be harmful to national food self-sufficiency. The trivial amount of electricity produced in the summer months would do nothing to outweigh the harm the development would cause.

For these reasons we ask that the application be refused.

Yours sincerely,

A handwritten signature in black ink that reads "Michael Tyce". The signature is written in a cursive style and is underlined.

Michael Tyce
Chairman, Thame District, Oxfordshire CPRE.

Attached. Greg Barker Statement